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1 **GEORGE L. HASSELBACK, ESQ.**  
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7 **Facsimile No. (670) 234-5683**

8 **Attorneys for Plaintiff Lisa Black**

9 **IN THE UNITED STATES DISTRICT COURT**  
10 **FOR THE NORTHERN MARIANA ISLANDS**

11 **LISA BLACK,**

12 **Plaintiff,**

13 **vs.**

14 **JIM BREWER, individually and in his**  
15 **official capacity as Acting Principal for**  
16 **Hopwood Junior High School,**  
17 **COMMONWEALTH OF THE NORTHERN**  
18 **MARIANA ISLANDS PUBLIC SCHOOL**  
19 **SYSTEM, and JOHN AND/OR JANE DOE,**

20 **Defendants.**

21 **CIVIL ACTION NO. 05-0038**

22 **PLAINTIFF'S SECOND SET OF**  
23 **REQUESTS FOR PRODUCTION OF**  
24 **DOCUMENTS**

25 **TO: COMMONWEALTH OF THE NORTHERN MARIANA ISLANDS PUBLIC**  
26 **SCHOOL SYSTEM, by and through their counsel.**

27 COMES NOW Plaintiff Lisa Black, by and through counsel, and makes the following  
28 discovery requests of Defendant Commonwealth of the Northern Mariana Islands Public School  
System ("PSS"). Pursuant to the Federal Rules of Civil Procedure, YOU are requested to  
answer the following discovery requests separately and in writing and under oath, and return  
said answers and/or produce the requested DOCUMENTS for copying and inspection within  
thirty (30) days at O'Connor Berman Dotts & Banes at the 2nd Floor of the Nauru Building,  
Susupe, Saipan, MP 96950.

1  
2 **INSTRUCTIONS AND DEFINITIONS**  
3

4 1. Please reference the "Instructions and Definitions" section of Plaintiff's First  
5 Request For Production Of Documents previously served upon YOU to which you have already  
6 responded.

7  
8 2. Should any of these requests seek the discovery of any DOCUMENTS that YOU  
9 consider to contain private information of persons or entities not party to this suit, please mark  
10 them "Confidential" and they will be treated in the manner outlined in the stipulated Protective  
11 Order signed by the Court.

12  
13 **REQUESTS FOR PRODUCTION OF DOCUMENTS**  
14

15 **Request For Production No 1.:** Please produce a complete copy of the personnel file of the  
16 "Ms. Katherine Barja" to whom several of the "student letters" (documents numbered 562-605  
17 in PSS's initial document production) were addressed.

18  
19 **Request For Production No 2.:** Please produce a complete copy of the personnel files of any  
20 and all persons who conducted, supervised, directed, planned, organized or otherwise were  
21 involved in the solicitation of the "student letters" (documents numbered 562-605 in PSS's  
22 initial document production).

23  
24 **Request For Production No 3.:** Please produce a complete copy of the personnel files of any  
25 and all persons who supervised, directed, planned, organized or otherwise were involved in the  
26 production of the "Memorandum" summarizing "student's concerns" (document numbered  
27 556 in PSS's initial document production).  
28

1 **Request For Production No 4.:** Please produce any and all DOCUMENTS related to the  
2 solicitation, creation and/or gathering of the "**student letters**" to include, but not be limited to,  
3 any notes taken by persons conducting interviews with students, recordings made of these  
4 interviews, parental permission slips granting PSS authorization to conduct these interviews  
5 and/or any and all materials used to prepare the "**Memorandum**" summarizing these interviews  
6 (document numbered 556 in PSS's initial document production).

7  
8 **Request For Production No 5.:** Please produce any and all DOCUMENTS that reflect the  
9 policies and procedures of PSS, formal or informal, that RELATE TO the **solicitation of**  
10 **students for their opinions** regarding their teachers.

11  
12 **Request For Production No 6.:** Please produce any and all DOCUMENTS that reflect the  
13 policies and procedures of PSS, formal or informal, that RELATE TO the **use of student**  
14 **opinion information in making personnel decisions** regarding PSS schoolteachers.

15  
16 **Request For Production No 7.:** Please produce any and all DOCUMENTS that support  
17 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
18 employment was not renewed because "**Plaintiff was insubordinate on several occasions.**" If  
19 YOU have already produced some or all of the DOCUMENTS responsive to this request, it is  
20 not necessary to produce them again, but rather IDENTIFY each of these documents by the  
21 Bates-stamp number with which YOU have marked them.

22  
23  
24 **Request For Production No 8.:** Please produce any and all DOCUMENTS that support  
25 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
26 employment was not renewed because "**Plaintiff failed to follow school policies and rules and**  
27 **HJHS administrators' instructions.**" If YOU have already produced some or all of the  
28 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather



1 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
2 them.

3  
4 **Request For Production No 9.:** Please produce any and all DOCUMENTS that YOU will  
5 introduce into evidence at trial or otherwise used to support YOUR contention in response to  
6 Plaintiff's interrogatories that Plaintiff's contract of employment was not renewed because  
7 "Plaintiff was difficult to work with and repeatedly had problems getting along with her  
8 supervisors, co-workers, other PSS employees and community members." If YOU have  
9 already produced some or all of the DOCUMENTS responsive to this request, it is not  
10 necessary to produce them again, but rather IDENTIFY each of these documents by the Bates-  
11 stamp number with which YOU have marked them.

12  
13 **Request For Production No 10.:** Please produce any and all DOCUMENTS that support  
14 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
15 employment was not renewed because "Plaintiff was abrasive, rude, condescending, pushy,  
16 hostile, inflexible, argumentative and constantly complaining about many matters  
17 concerning her employment with HJHS and PSS." If YOU have already produced some or  
18 all of the DOCUMENTS responsive to this request, it is not necessary to produce them again,  
19 but rather IDENTIFY each of these documents by the Bates-stamp number with which YOU  
20 have marked them.

21  
22 **Request For Production No 11.:** Please produce any and all DOCUMENTS that support  
23 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
24 employment was not renewed because "Plaintiff constantly questioned the authority of  
25 administrators." If YOU have already produced some or all of the DOCUMENTS responsive  
26 to this request, it is not necessary to produce them again, but rather IDENTIFY each of these  
27 documents by the Bates-stamp number with which YOU have marked them.

1 **Request For Production No 12.:** Please produce any and all DOCUMENTS that support  
2 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
3 employment was not renewed because **"Plaintiff had difficulty working in a team and**  
4 **cooperating with others, often demanding that the HJHS administrators and staff proceed**  
5 **according to her terms in many matters."** If YOU have already produced some or all of the  
6 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather  
7 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
8 them.

9  
10 **Request For Production No 13.:** Please produce any and all DOCUMENTS that support  
11 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
12 employment was not renewed because **"Plaintiff had poor rapport with students and**  
13 **engaged in odd behavior in the classroom."** If YOU have already produced some or all of the  
14 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather  
15 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
16 them.

17  
18 **Request For Production No 14.:** Please produce any and all DOCUMENTS that support  
19 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
20 employment was not renewed because **"Plaintiff assaulted students by flicking their ears and**  
21 **pushing their heads."** If YOU have already produced some or all of the DOCUMENTS  
22 responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each  
23 of these documents by the Bates-stamp number with which YOU have marked them.

24  
25 **Request For Production No 15.:** Please produce any and all DOCUMENTS that support  
26 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
27 employment was not renewed because **"Plaintiff singled out the son of Vice-Principal Beth**  
28 **Nepaial in front of his classmates and embarrassed him."** If YOU have already produced

1 some or all of the DOCUMENTS responsive to this request, it is not necessary to produce them  
2 again, but rather IDENTIFY each of these documents by the Bates-stamp number with which  
3 YOU have marked them.

4  
5 **Request For Production No 16.:** Please produce any and all DOCUMENTS that support  
6 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
7 employment was not renewed because "Students, staff and parents complained to the HJHS  
8 administration regarding Plaintiff's attitude and behavior." If YOU have already produced  
9 some or all of the DOCUMENTS responsive to this request, it is not necessary to produce them  
10 again, but rather IDENTIFY each of these documents by the Bates-stamp number with which  
11 YOU have marked them.

12  
13 **Request For Production No 17.:** Please produce any and all DOCUMENTS that YOU will  
14 introduce into evidence at trial or otherwise used to support YOUR contention in response to  
15 Plaintiff's interrogatories that Plaintiff's contract of employment was not renewed because  
16 "Plaintiff failed to meet the objectives and terms of the grant awarded to her by the  
17 Governor's Office and failed to provide HJHS with the services and products listed in  
18 such grant." If YOU have already produced some or all of the DOCUMENTS responsive to  
19 this request, it is not necessary to produce them again, but rather IDENTIFY each of these  
20 documents by the Bates-stamp number with which YOU have marked them.

21  
22 **Request For Production No 18.:** Please produce any and all DOCUMENTS related to the  
23 approval, award, distribution and/or use of funds provided pursuant to Governor Juan N.  
24 Babauta's Education Initiative to any and all employees of PSS, including, but not limited to,  
25 Jim Brewer, Christine Halloran, Walter Taitainfong and John Pialur, from January 2003 to the  
26 present to include, but not be limited to:

- 27 a. Any and all DOCUMENTS RELATED TO applications for the aforementioned  
28 grants,



- b. Any and all DOCUMENTS RELATED TO the award of the aforementioned grants,
- c. Any and all DOCUMENTS RELATED TO grant reports submitted by the aforementioned recipients,
- d. Any and all DOCUMENTS reflecting how the grant proceeds distributed to the aforementioned recipients were utilized to include, but not be limited to, individual budgets, receipts, cancelled checks and purchase orders,
- e. And, any and all other DOCUMENTS evidencing how the aforementioned recipients utilized the grant money they were given.

In so producing, please indicate (if the DOCUMENTS do not already do so) the date upon which these DOCUMENTS were provided to PSS.

**Request For Production No 19.:** Please produce any and all DOCUMENTS that support YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of employment was not renewed because **"In April of 2004, Plaintiff held at least two students after school (O.C. and T.G.) causing parent concern that students missed their rides homes."** If YOU have already produced some or all of the DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked them.

**Request For Production No 20.:** Please produce any and all DOCUMENTS that support YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of employment was not renewed because **"In May of 2004, Plaintiff had problems with co-worker Eileen Babauta regarding Plaintiff informing students that she is psychic; students in Cecile Manahane's class complained of being frightened that Black can tell the future."** If YOU have already produced some or all of the DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked them.

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2  
3 **Request For Production No 21.:** Please produce any and all DOCUMENTS that support  
4 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
5 employment was not renewed because **"In May of 2004, Plaintiff refused to provide make-up**  
6 **work to student S.L. and questioned the authority of Vice-Principal Nepaial inquiring into**  
7 **the situation."** If YOU have already produced some or all of the DOCUMENTS responsive to  
8 this request, it is not necessary to produce them again, but rather IDENTIFY each of these  
9 documents by the Bates-stamp number with which YOU have marked them.

10  
11 **Request For Production No 22.:** Please produce any and all DOCUMENTS that support  
12 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
13 employment was not renewed because **"In June 2004, Plaintiff refused to accept placement**  
14 **as physical education teacher for school year 04/05 wishing to remain as Math teacher;**  
15 **cooperation with HJHS Administration steadily decreased after Plaintiff was placed as**  
16 **Life Skills teacher for 04/05."** If YOU have already produced some or all of the  
17 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather  
18 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
19 them.

20  
21 **Request For Production No 23.:** Please produce any and all DOCUMENTS that support  
22 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
23 employment was not renewed because **"In July or early August of 2004, Plaintiff had**  
24 **problems with co-worker Annie Torres regarding classroom relocation and furniture."** If  
25 YOU have already produced some or all of the DOCUMENTS responsive to this request, it is  
26 not necessary to produce them again, but rather IDENTIFY each of these documents by the  
27 Bates-stamp number with which YOU have marked them.



1  
2 **Request For Production No 24.:** Please produce any and all DOCUMENTS that support  
3 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
4 employment was not renewed because "In August of 2004, Principal Brewer told Black not to  
5 tell students that "I know what you are thinking"based on superstitions and fear of students."  
6 If YOU have already produced some or all of the DOCUMENTS responsive to this request, it is  
7 not necessary to produce them again, but rather IDENTIFY each of these documents by the  
8 Bates-stamp number with which YOU have marked them.

9  
10 **Request For Production No 25.:** Please produce any and all DOCUMENTS that support  
11 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
12 employment was not renewed because "In late September or October 2004, Plaintiff refused  
13 to move from temporary library classroom to room V-6." If YOU have already produced  
14 some or all of the DOCUMENTS responsive to this request, it is not necessary to produce them  
15 again, but rather IDENTIFY each of these documents by the Bates-stamp number with which  
16 YOU have marked them.

17  
18 **Request For Production No 26.:** Please produce any and all DOCUMENTS that support  
19 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
20 employment was not renewed because "In October of 2004, Plaintiff had dispute with co-  
21 worker Christine Halloran regarding a bathroom key." If YOU have already produced  
22 some or all of the DOCUMENTS responsive to this request, it is not necessary to produce them  
23 again, but rather IDENTIFY each of these documents by the Bates-stamp number with which  
24 YOU have marked them.

25  
26 **Request For Production No 27.:** Please produce any and all DOCUMENTS that support  
27 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
28 employment was not renewed because "In October 21, 2004, Plaintiff failed to follow school

1 policies, procedures and instructions by awarding students pass/fail grades instead of  
2 percentage grades.” If YOU have already produced some or all of the DOCUMENTS  
3 responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each  
4 of these documents by the Bates-stamp number with which YOU have marked them.

5  
6 **Request For Production No 28.:** Please produce any and all DOCUMENTS that support  
7 YOUR contention in response to Plaintiff’s interrogatories that Plaintiff’s contract of  
8 employment was not renewed because “In January 2005, Plaintiff refused to provide  
9 substitution coverage as assigned and could not be located on campus during instructional  
10 hours.” If YOU have already produced some or all of the DOCUMENTS responsive to this  
11 request, it is not necessary to produce them again, but rather IDENTIFY each of these  
12 documents by the Bates-stamp number with which YOU have marked them.

13  
14 **Request For Production No 29.:** Please produce any and all DOCUMENTS that support  
15 YOUR contention in response to Plaintiff’s interrogatories that Plaintiff’s contract of  
16 employment was not renewed because “In January 2005, Plaintiff interrupted Cecile  
17 Manahane’s class during instructional time and singled out the son of Vice-Principal Beth  
18 Nepaial in front of his classmates and embarrassed him.” If YOU have already produced  
19 some or all of the DOCUMENTS responsive to this request, it is not necessary to produce them  
20 again, but rather IDENTIFY each of these documents by the Bates-stamp number with which  
21 YOU have marked them.

22  
23 **Request For Production No 30.:** Please produce any and all DOCUMENTS that support  
24 YOUR contention in response to Plaintiff’s interrogatories that Plaintiff’s contract of  
25 employment was not renewed because “In January 2005, soon after interrupting Ms.  
26 Manahane’s class, Plaintiff called Ms. Nepaial’s husband (Andy Nepaial) at home to discuss  
27 incident in subsection k.” If YOU have already produced some or all of the DOCUMENTS  
28

1 responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each  
2 of these documents by the Bates-stamp number with which YOU have marked them.

3  
4 **Request For Production No 31.:** Please produce any and all DOCUMENTS that support  
5 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
6 employment was not renewed because **"In January 2005, Katherine Barja, HJHS teacher,**  
7 **submitted student complaints to HJHS Administration regarding Ms. Black's treatment**  
8 **of students, including odd behavior and assault of the students."** If YOU have already  
9 produced some or all of the DOCUMENTS responsive to this request, it is not necessary to  
10 produce them again, but rather IDENTIFY each of these documents by the Bates-stamp number  
11 with which YOU have marked them.

12  
13 **Request For Production No 32.:** Please produce any and all DOCUMENTS that support  
14 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
15 employment was not renewed because **"In February 2005, Plaintiff confronted co-worker**  
16 **Rory Starkey and threatened him."** If YOU have already produced some or all of the  
17 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather  
18 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
19 them.

20  
21 **Request For Production No 33.:** Please produce any and all DOCUMENTS that support  
22 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
23 employment was not renewed because **"In February 2005, Plaintiff interrupted Menchu**  
24 **Grayer's classroom during instructional time causing Ms. Grayer to feel threatened;**  
25 **Plaintiff interrupted the class and spoke with Ms. Grayer despite specific instructions**  
26 **from Principal Brewer."** If YOU have already produced some or all of the DOCUMENTS  
27 responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each  
28 of these documents by the Bates-stamp number with which YOU have marked them.



1  
2 **Request For Production No 34.:** Please produce any and all DOCUMENTS that support  
3 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
4 employment was not renewed because "In February 2005, the HJHS Administration  
5 received a student complaint regarding students' fear of Plaintiff and Plaintiff requiring  
6 the students to repeat that Plaintiff is not psychic." If YOU have already produced some or  
7 all of the DOCUMENTS responsive to this request, it is not necessary to produce them again,  
8 but rather IDENTIFY each of these documents by the Bates-stamp number with which YOU  
9 have marked them.

10  
11 **Request For Production No 35.:** Please produce any and all DOCUMENTS that support  
12 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
13 employment was not renewed because "In March 2005, Principal Jim Brewer became aware  
14 that Plaintiff inappropriately and without authorization connected a phone line to her  
15 room." If YOU have already produced some or all of the DOCUMENTS responsive to this  
16 request, it is not necessary to produce them again, but rather IDENTIFY each of these  
17 documents by the Bates-stamp number with which YOU have marked them.

18  
19 **Request For Production No 36.:** Please produce any and all DOCUMENTS that support  
20 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
21 employment was not renewed because "In March 2005, Plaintiff had dispute with Katherine  
22 Barja." If YOU have already produced some or all of the DOCUMENTS responsive to this  
23 request, it is not necessary to produce them again, but rather IDENTIFY each of these  
24 documents by the Bates-stamp number with which YOU have marked them.

25  
26 **Request For Production No 37.:** Please produce any and all DOCUMENTS that support  
27 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
28 employment was not renewed because "In March 2005, Principal Brewer became aware of

1 **Plaintiff detaining students during their lunch time and preventing the students from**  
2 **eating lunch."** If YOU have already produced some or all of the DOCUMENTS responsive to  
3 this request, it is not necessary to produce them again, but rather IDENTIFY each of these  
4 documents by the Bates-stamp number with which YOU have marked them.

5  
6 **Request For Production No 38.:** Please produce any and all DOCUMENTS that support  
7 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
8 employment was not renewed because **"In March/April of 2005, Principal Brewer became**  
9 **aware of the terms of the Governor's Grant and Plaintiff's apparent failure to meet the**  
10 **terms of the grant."** If YOU have already produced some or all of the DOCUMENTS  
11 responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each  
12 of these documents by the Bates-stamp number with which YOU have marked them.

13  
14 **Request For Production No 39.:** Please produce any and all DOCUMENTS that support  
15 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
16 employment was not renewed because **"In April 2005, Plaintiff refused to provide make-up**  
17 **work for student H.W. and refused to provide any information regarding the issue to the**  
18 **Principal in a timely manner."** If YOU have already produced some or all of the  
19 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather  
20 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
21 them.

22  
23 **Request For Production No 40.:** Please produce any and all DOCUMENTS that YOUR  
24 contention in response to Plaintiff's interrogatories that Plaintiff's contract of employment was  
25 not renewed because **"In April 2005, Plaintiff refused to report to a meeting with the**  
26 **administrators of HJHS."** If YOU have already produced some or all of the DOCUMENTS  
27 responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each  
28 of these documents by the Bates-stamp number with which YOU have marked them.

1  
2 **Request For Production No 41.:** Please produce any and all DOCUMENTS that support  
3 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
4 employment was not renewed because **"Throughout second semester 2004-05, Plaintiff had**  
5 **problems during cohort meetings, including confrontations with Joseph Connolly and**  
6 **Katherine Barja."** If YOU have already produced some or all of the DOCUMENTS  
7 responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each  
8 of these documents by the Bates-stamp number with which YOU have marked them.

9  
10 **Request For Production No 42.:** Please produce any and all DOCUMENTS that support  
11 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
12 employment was not renewed because **"Plaintiff received two letters of insubordination**  
13 **while a teacher at Koblerville Elementary School (KES) and took leave from KES after**  
14 **being informed that the leave was disapproved."** If YOU have already produced some or all  
15 of the DOCUMENTS responsive to this request, it is not necessary to produce them again, but  
16 rather IDENTIFY each of these documents by the Bates-stamp number with which YOU have  
17 marked them.

18  
19 **Request For Production No 43.:** Please produce any and all DOCUMENTS that support  
20 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of  
21 employment was not renewed because **"Plaintiff's contract of employment was not renewed**  
22 **at San Antonio Elementary School."** If YOU have already produced some or all of the  
23 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather  
24 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
25 them.

26  
27 **Request For Production No 44.:** Please produce any and all DOCUMENTS that support  
28 YOUR contention in response to Plaintiff's interrogatories that Plaintiff's contract of



1 employment was not renewed because "**Principal Brewer learned of subsections t., u. and v.**  
2 **above during May of 2004.**" If YOU have already produced some or all of the DOCUMENTS  
3 responsive to this request, it is not necessary to produce them again, but rather IDENTIFY each  
4 of these documents by the Bates-stamp number with which YOU have marked them.

5  
6 **Request For Production No 45.:** Please produce any and all DOCUMENTS that reflect that  
7 any of the eleven items of "information" available to Defendant Jim Brewer (as identified in  
8 your response to Plaintiff's Interrogatory No. 1 from Plaintiff's First Set Of Interrogatories)  
9 were considered prior to April 2005 in determining whether or not to renew Plaintiff's  
10 employment contract with PSS. If YOU have already produced some or all of the  
11 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather  
12 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
13 them.

14  
15 **Request For Production No 46.:** Please produce any and all DOCUMENTS that were  
16 considered prior to April 2005 in determining whether or not to renew Plaintiff's employment  
17 contract with PSS. If YOU have already produced some or all of the DOCUMENTS responsive  
18 to this request, it is not necessary to produce them again, but rather IDENTIFY each of these  
19 documents by the Bates-stamp number with which YOU have marked them.

20  
21 **Request For Production No 47.:** Please produce any and all DOCUMENTS that reflect  
22 what information was considered prior to April 2005 in determining whether or not to renew  
23 Plaintiff's employment contract with PSS. If YOU have already produced some or all of the  
24 DOCUMENTS responsive to this request, it is not necessary to produce them again, but rather  
25 IDENTIFY each of these documents by the Bates-stamp number with which YOU have marked  
26 them.

1  
2  
3 Dated: May 26, 2006

O'CONNOR BERMAN DOTTS & BANES  
Attorneys for Plaintiff Lisa Black

4  
5  
6  
7 By:

  
GEORGE L. HASSELBACK

\*\*\*\*\*  
 \*\*\* TX REPORT \*\*\*  
 \*\*\*\*\*

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## LAW OFFICES OF O'CONNOR BERMAN DOTT & BANES

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## FAX COVER SHEET

FAX NUMBER TRANSMITTED TO: 664-3713

To: Heather Kennedy  
 Of: Public School System  
 From: George L. Hasselback, Esq.  
 Client/Matter: 3221-01/Lisa Black  
 Date: May 3, 2006

| DOCUMENTS   | NUMBER OF PAGES* |
|---|------------------|
| Plaintiff's Second Set of Requests for Production of Documents. | 16               |

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